

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

**SAINT VINCENTS CATHOLIC MEDICAL  
CENTERS OF NEW YORK, et al.,**

**Debtors.**

Case No.: 10-11963 (cgm)  
(Chapter 11)

Hon. Cecilia G. Morris  
Bankruptcy Judge

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**SUPPLEMENTAL OBJECTION TO ENTRY OF AN ORDER (I) APPROVING THE  
ENTRY INTO THE AMENDED AND RESTATED CONTRACT OF SALE FOR  
THE REAL ESTATE AND PERSONAL PROPERTY COMPRISING THE  
DEBTORS' MANHATTAN CAMPUS TO RSV, LLC AND NORTH SHORE-LONG  
ISLAND JEWISH HEALTH CARE SYSTEM; (II) APPROVING SUCH SALE FREE  
AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES AND OTHER INTERESTS; (III)  
DIRECTING OCCUPANTS UNDER TERMINATED LEASES TO VACATE THE  
PROPERTY; AND (IV) GRANTING RELATED RELIEF PURSUANT TO SECTIONS  
105 AND 363 OF THE BANKRUPTCY CODE ("THE SALE ORDER")**

To the Honorable Judge Morris:

Dudley Gaffin, Alan J. Gerson and Dr. Robert Adelman (collectively and hereinafter "the Objecting Alternative Purchaser Group") through their attorney James H. Shenwick, Esq., Shenwick & Associates, submits this Response to supplement its March 23, 2011 objection to the Motion by Saint Vincents Catholic Medical Centers of New York (hereinafter "the Debtors") for an Order (I) Approving the Entry Into the Amended and Restated Contract of Sale for the Real Estate and Personal Property Comprising the Debtors' Manhattan Campus to RSV, LLC and North Shore-Long Island Jewish Health System; (II) Approving Such Sale Free and Clear of Liens, Claims, Encumbrances and Other Interests; (III) Directing Occupants Under Terminated

Leases to Vacate the Property; and (IV) Granting Related Relief Pursuant to Sections 363 of the Bankruptcy Code (the “Sale Order”) for the reasons provided below:

**BACKGROUND**

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105(a), 28 U.S.C. §157(b)(1), and 28 U.S.C. §1334. This matter constitutes a core proceeding as defined by 28 U.S.C. §157(b)(2).

**ARGUMENT**

2. The Objecting Alternative Purchaser Group seeks an adjournment of the entry of the Sale Order for an additional 45 days, until May 23, 2011, while the Objecting Alternative Purchaser Group continues to solicit offers from major real estate investors and hospital operators that will better serve the communities served by the Debtors’ Manhattan Campus and generate more monies for the repayment of creditors. For example, the National Football League Alumni Association has contacted the Objecting Alternative Purchaser Group and indicated that they may like to be involved in establishing a hospital to treat their members.

3. As a matter of public policy, the proposals solicited by the Objecting Alternative Purchaser Group would be better for the communities served by the Debtors’ Manhattan Campus and would generate more monies for the repayment of creditors, so a delay of 45 days would not be harmful in totality.

4. Another reason that the Objecting Alternative Purchaser Group seeks an adjournment of the entry of the Sale Order is that six months ago, Dudley Gaffin (a member of the Objecting Alternative Purchaser Group) contacted Eastern Consolidated, a real estate investment services firm retained by the Debtor, to request information regarding the parcels that comprise the Debtors’ Manhattan Campus, and Eastern Consolidated refused to give him that information.

5. St. Vincent's Hospital was founded in 1849, 162 years ago. An adjournment of 45 days while the Objecting Alternative Purchaser Group seeks to establish a replacement hospital poses little harm to the Debtors' bankruptcy estate.

6. The Objecting Alternative Purchaser Group's efforts to solicit proposals for the Debtors' Manhattan Campus were delayed because North Shore-Long Island Jewish Health System delayed announcing its plans for the Debtors' Manhattan Campus (i.e. a full hospital or a medical center).

**WHEREFORE**, the Objecting Alternative Purchaser Group respectfully requests that this Court: (1) deny the entry of an Order (I) Approving the Entry Into the Amended and Restated Contract of Sale for the Real Estate and Personal Property Comprising the Debtors' Manhattan Campus to RSV, LLC and North Shore-Long Island Jewish Health System; (II) Approving Such Sale Free and Clear of Liens, Claims, Encumbrances and Other Interests; (III) Directing Occupants Under Terminated Leases to Vacate the Property; and (IV) Granting Related Relief Pursuant to Sections 363 of the Bankruptcy Code (the "Sale Order"); (2) enter an Order approving the sale of the Debtor's Manhattan Campus to the Objecting Alternative Purchaser Group; and (3) for further relief as to the Court seems just and proper.

DATED: April 6, 2011

SHENWICK & ASSOCIATES  
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Purchaser Group")

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